

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mary L. Cooper
v. : Criminal No. 15-14(MLC)
CHANNEL LESPINASSE : 18 U.S.C. § 1951(a)

AT 8:30 M
WILLIAM T. WALSH CLERK

INFORMATION

The defendant having waived in open court prosecution by
indictment, the United States Attorney for the District of New Jersey
charges:

Introduction

1. At certain times relevant to this Information:
 - a. Defendant CHANNEL LESPINASSE was a Corrections Officer with the Essex County Correctional Facility ("Essex County Jail") in Newark, New Jersey.
 - b. D.H., a co-conspirator not named as a defendant herein, resided in Newark, New Jersey.
 - c. There was a cooperating witness ("CW-1") who was a federal pretrial detainee at the Essex County Jail.
 - d. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant to, a contract or agreement with the United States Attorney General.

The Conspiracy

2. In or about November 2013, in Essex County, in the District

of New Jersey, defendant

CHANNEL LESPINASSE

did knowingly and intentionally conspire and agree with D.H. to obstruct, delay, and affect interstate commerce by extortion under color of official right, by accepting a corrupt payment that was paid and to be paid by another, with that person's consent, in exchange for CHANNEL LESPINASSE's official action and assistance in violation of her official duties at the Essex County Correctional Facility.

Object of the Conspiracy

3. The object of the conspiracy was for LESPINASSE to receive a payment in exchange for smuggling contraband, including a cellular telephone, into the Essex County Jail for distribution to an inmate.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. D.H. retrieved contraband, including a cellular telephone manufactured outside of New Jersey, to be smuggled into the Essex County Jail by defendant CHANNEL LESPINASSE, in exchange for payment.

b. D.H. received a cash payment in Newark, New Jersey, for defendant CHANNEL LESPINASSE's assistance in smuggling contraband into the Essex County Jail.

c. Defendant CHANNEL LESPINASSE received the cash payment and contraband from D.H. in Newark, New Jersey.

d. Defendant CHANNEL LESPINASSE smuggled the contraband into the Essex County Jail and delivered it to CW-1.

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendant CHANNEL LESPINASSE, that upon conviction of the offense charged in this Information, the government will seek forfeiture in the amount of \$1,000 in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds traceable to such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other

property of defendant CHANNEL LESPINASSE up to the value of the
forfeitable property described in paragraph 2.

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

CHANNEL LESPINASSE

INFORMATION FOR

18 U.S.C. § 1951(a)

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